

AC2-034

***National
Environmental
Achievement Track
Application Form***

POUGHKEEPSIE

Name of facility

IBM

Name of parent company (if any)

2455 South Road

Street address

Street address (cont.)

Poughkeepsie/NY/12601

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Steve Brannen

Title Sr. Environmental Engineer

Phone (845) 433-1509

Fax (845) 432-9604

E-mail SPBRANN@US.IBM.COM



Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Development and manufacture of
Large scale servers/systems including
Hardware and software associated
With these systems.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

3,571	3572	3,679
_____	_____	_____
NAICS		
_____	_____	_____

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50
☐ 50-99
☐ 100-499
☐ 500-1,000
☒ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes ☐ No

If yes, list in the right-hand column.

NYSDEC#- 3-1346-00035/00464;
NYD980762090; NYD080480734;
NYD000799130;NYR000012955;
NYSDEC#-3-1346-00035-00076

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

SEE ATTACHED

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Section B

Tell us about your EMS

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ----- ☒ Yes

b. Planning ----- ☒ Yes

c. Implementation and operation ----- ☒ Yes

d. Checking and corrective action ----- ☒ Yes

e. Management review ----- ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use? ☒ Self-assessment

Note 1. IBM Professional Self Assessment - Internal Protocol
Location Internal EMS (ISO 14001) audits

☐ GEMI ☒ Other
☐ CEMP

NOTE 1.

☐ Third-party assessment

Ongoing BVQI Surveillance Audits

Note 2 - IBM Corporate Internal Audit - Independent Organization within IBM

☒ ISO 14001 Certification

☒ Other

Note 2

Section C

Tell us about your past achievements and future commitments

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total electric energy use	257,303,000	KWH's	239,600,000	KWH's
<p>i. How is the current level an improvement over the previous level ?</p> <p>Currently the sites' total electric energy usage is approx. 8.5% below the same Usage for the same period for 1998. YE projections are 6.9% below the subject period.</p>				
<p>ii How did you achieve this improvement?</p> <p>Installed high efficient electric chiller</p> <p>Reduced operational time for air conditioning systems</p> <p>Upgrade lighting with high efficiency tubes and electronic ballasts</p> <p>Installed high efficient chilled water pumps</p> <p>Replaced / upgraded steam traps.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Air Emissions- ODC's	54,731	lbs.	27,490	lbs.
<p>i. How is the current level an improvement over the previous level? Reduces the use of ODC/CFC's in sites' chillers</p> <hr/> <p>CFC's = Chloroflourocarbons; ODC's = Ozone Depleting Compounds</p> <hr/>				
<p>ii. How did you achieve this improvement?</p> <p>Required that all new chillers must use R-134a. All retrofits must also have cfc replaced by hcfc</p> <hr/> <hr/> <hr/>				

2. Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Total energy consumption

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

<input checked="" type="checkbox"/> Option A: Absolute value	<div style="border-bottom: 1px solid black; padding-bottom: 5px;">1282755MBTU's</div> (Quantity/Units)
<input type="checkbox"/> Option B: In terms of units of production or output	<div style="border-bottom: 1px solid black; padding-bottom: 5px;"></div> (Quantity/Units)

Appendix D IBM Poughkeepsie
Last Modified: January 11, 2001

A02-0029

- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

<input checked="" type="checkbox"/> Option A:	153930MBTU's (4%/yr conservation)
Absolute value	(Quantity/Units)
<input type="checkbox"/> Option B:	
In terms of units of production or output	(Quantity/Units)

- e. How will you achieve this improvement?
Total energy use
(Approach to achieve this improvement :
Energy conservation projects; ops efficiency; and procurement of low cost energy)

Achieve 4% energy conservation savings in
Each year's actual energy consumption
(electric and fuel).

Second aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Recycling/Reuse of Manufacturing
Waste Plastic Packaging

<input checked="" type="checkbox"/> Yes	No
<input checked="" type="checkbox"/> Option A:	0 tons per year
Absolute value	(Quantity/Units)
<input type="checkbox"/> Option B:	
In terms of units of production or output	(Quantity/Units)
<input checked="" type="checkbox"/> Option A:	80 tons per year
Absolute value	(Quantity/Units)
<input type="checkbox"/> Option B:	
In terms of units of production or output	(Quantity/Units)

- e. How will you achieve this improvement?
Market analyses and development with vendors and

Incorporate the recycle/reuse of waste plastics
Into the existing site's solid waste
Management program.

JS
1/12/2001
Page 8

Appendix D IBM Poughkeepsie
Last Modified: January 11, 2001

A02-0029

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

(Total amount generated in 1999 was 1223K pounds)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- e. How will you achieve this improvement?

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

(Total amount generated in 1999 was 3227tons)

- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- e. How will you achieve this improvement?

Hazardous waste

☒ Yes ☐ No

☐ Option A: Absolute value (Quantity/Units)

☒ Option B: In terms of units of production or output 5.01 % reduction (Quantity/Units)

☐ Option A: Absolute value (Quantity/Units)

☒ Option B: In terms of units of production or output >0.0% reduction (Quantity/Units)

Positive year to year reduction/part via reuse.

Reduction, increases to process efficiencies

Non Hazardous Waste-recycle

☒ Yes ☐ No

☒ Option A: Absolute value 67% recycle rate (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

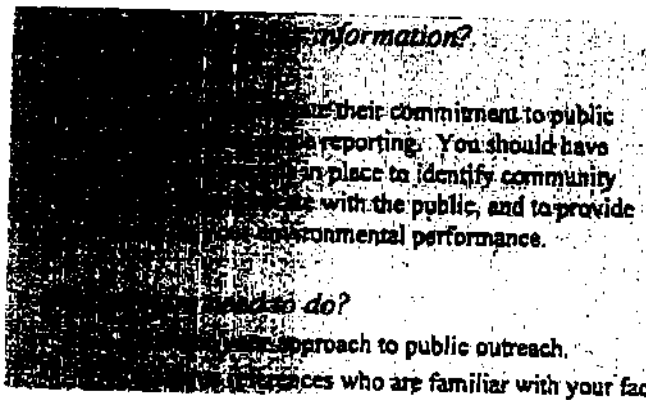
☒ Option A: Absolute value 70% recycle rate (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

Process reviews: employee awareness; market Analyses. (doesn't include waste to energy)

Appendix D IBM Poughkeepsie
Last Modified: January 11, 2001

A02-0029



1 How do you identify and respond to community concerns?

IBM POK maintains a community relations office which monitors and responds to community concerns that may arise. We work closely with local officials and government regulators. We participate annually in Earth day and America recycles events where we disseminate information on environmental programs.

2 How do you inform community members of important matters that affect them?

This site has a procedure within our EMS (POKENV4.4.3-"Communication") Also Site procedure POKOPS1.8.1 . Also via CEA publications.

Fire Dept. Report U209

SARA 312

SARA 313

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.ibm.com/Environment/

☐ Newspaper

☐ Open Houses

☐ Other

The current plan is to compile location specific information and make this available on the Corporate Environmental Website

Page 10
J 01/12/2001

Section D, continued

4 Are there any ongoing citizen suits against your facility?

☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
<i>Representative of a Community/ Citizen Group</i>	Arlington Fire District	Lt. David Walsh	(845) 486-6308
<i>State/Local regulator</i>	NYSDEC	John Sansalone	(845) 255 0319
<i>Other community/local reference</i>	USGS	Jay Weigel	(518) 285-5649

Section E

Application and Participation Statement.

On behalf of

____IBM - POUGHKEEPSIE____
[my facility],

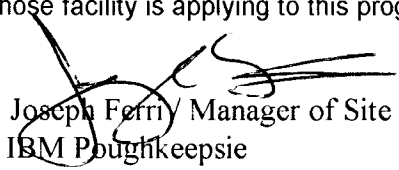
I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date
Printed Name/Title
Facility Name

 9/31/2000
Joseph Ferri / Manager of Site Facilities & Environmental Services
IBM Poughkeepsie

Facility Street Address : 2455 SOUTH ROAD, POUGHKEEPSIE, NY , 12601

Facility INumbers: NYSDEC# 3-1346-00035/00464 & 3-1346-00035-00076; NYD08040734

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about Your facility, Question 6*. The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: IBM POUGHKEEPSIE

Facility Location: 2455 So. Rd. ;Poughkeepsie, NY 12601

Facility ID Number(s) NYD080480734; DEC#3-1346-00035-00076
(attach additional sheets if necessary)

Check All
That Apply

Air Pollution Regulations

- | | |
|---|---|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | X |
| 2. Permits and Registration of Air Pollution Sources | X |
| 3. General Emission Standards, Prohibitions and Restrictions | X |
| 4. Control of Incinerators | |
| 5. Process Industry Emission Standards | |
| 6. Control of Fuel Burning Equipment | X |
| 7. Control of VOCs | X |
| 8. Sampling, Testing and Reporting | X |
| 9. Visible Emissions Standards | X |
| 10. Control of Fugitive Dust | |
| 11. Toxic Air Pollutants Control | |
| 12. Vehicle Emissions Inspections and Testing | |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

13. 6NYCRR part 200-250
14. Chapter III subpart A
-

Hazardous Waste Management Regulations

- | | | |
|----|--|---|
| 1. | Identification and Listing of Hazardous Waste (40 CFR 261) | x |
| | - Characteristic Waste | x |
| | - Listed Waste | x |
| 2. | Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | x |
| | - Manifesting | x |
| | - Pre-transport requirements | x |
| | - Record keeping/reporting | x |
| 3. | Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) | |
| | - Transfer facility requirements | |
| | - Manifest system and record-keeping | |
| | - Hazardous waste discharges | |
| 4. | Standards for Owners and Operators of TSD Facilities (40 CFR 264) | x |
| | - General facility standards | x |
| | - Preparedness and prevention | x |
| | - Contingency plan and emergency procedures | x |
| | - Manifest system, Record keeping and reporting | x |
| | - Groundwater protection | x |
| | - Financial requirements | x |
| | - Use and management of containers | x |
| | - Tanks | x |
| | - Waste piles | |
| | - Land treatment | |
| | - Incinerators | |
| 5. | Interim Status Standards for TSD Owners and Operators (40 CFR 265) | x |
| 6. | Interim Standards for Owners and Operators of New Hazardous Waste
Land Disposal Facilities (40 CFR 267) | |
| 7. | Administered Permit Program (Part B) (40 CFR 270) | x |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. 6NYCRR parts 360 - 376 also parts 616-624 and part 485
9. _____

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) x
4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
5. Community Right-to-Know Regulations (40 CFR 350-372)

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

6. _____
7. _____

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
2. Permit Requirements for Solid Waste Disposal Facilities
3. Installation of Systems of Refuse Disposal
4. Solid Waste Storage and Removal Requirements
5. Disposal Requirements for Special Wastes

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

6. Dutchess County Local Law 4 - Recycling
7. _____

Water Pollution Control Requirements

- | | | |
|-----|--|---|
| 1. | Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | x |
| 2. | Designation of Hazardous Substances (40 CFR 116) | x |
| 3. | Determination of Reportable Quantities for Hazardous Substances
(40 CFR 117) | x |
| 4. | NPDES Permit Requirements (40 CFR 122) | x |
| 5. | Toxic Pollutant Effluent Standards (40 CFR 129) | x |
| 6. | General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | x |
| 7. | Organic Chemicals Manufacturing Point Source Effluent Guidelines
And Standards (40 CFR 414) | |
| 8. | Inorganic Chemicals Manufacturing Point Source Effluent Guidelines
and Standards (40 CFR 415) | |
| 9. | Plastics and Synthetics Point Source Effluent Guidelines and Standards
(40 CFR 416) | |
| 10. | Water Quality Standards | x |
| 11. | Effluent Limitations for Direct Dischargers | x |
| 12. | Permit Monitoring/Reporting Requirements | x |
| 13. | Classifications and Certifications of Operators and Superintendents
of Industrial Wastewater Plants | |
| 14. | Collection, Handling, Processing of Sewage Sludge | |
| 15. | Oil Discharge Containment, Control and Cleanup | |
| 16. | Standards Applicable to Indirect Discharges (Pretreatment) | x |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. 6NYCRR parts 610 ; parts 612 to 614 and parts 595 to 599
18. _____

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards
(40 CFR 144, 146)
2. National Primary Drinking Water Standards (40 CFR 141)
3. Community Water Systems, Monitoring and Reporting Requirements
(40 CFR 141)
4. Permit Requirements for Appropriation /Use of Water from Surface or
Subsurface Sources
5. Underground Injection Control Requirements
6. Monitoring, Reporting and Record keeping Requirements for Community
Water Systems

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

7. Public Health Law Section 225, subpart 5 Public Water Systems
8. _____

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)
2. Import and Export of Chemicals (40 CFR 707) x
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
4. Chemical Information Rules (40 CFR 712)
5. Health and Safety Data Reporting (40 CFR 716)
6. Pre-Manufacture Notifications (40 CFR 720)
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) x
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above
(identify)

10. _____
11. _____

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162)
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)
3. Certification of Pesticide Applications (40 CFR 17.1)
4. Pesticide Licensing Requirements
5. Labeling of Pesticides
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
7. Disposal of Pesticide Containers
8. Restricted Use and Prohibited Pesticides

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. 6NYCRR part 325
10. _____

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)

2. RCRA Corrective Action (*identify*)

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (*identify*)

3. 6NYCRR part 373 permit module III- corrective actions for
Groundwater and contaminated soil.

4.
